

Order to show Cause

A mended Complaint

Kristina M. Larson
v.

American Home Products (AHP) / Wyeth-Ayerst Laboratories

Case #: 2:19-cv-00685-RAJ-LRL

Dear Sir or Mam, I do not own a computer. I have now way to get to a library to do any type of legal research. I do not own a phone that is capable of connecting to the internet. I have no way to type this information for you.

(1)

I identify Disability:

* Anxiety + Depression to the point of such severity that my own attorney had to drop me out of concern for my well being. This is the main disability

ADD - the ADD got so bad when I was taking the anti-depressants, before I knew I had ADD, that I could barely focus enough to make phone calls, open mail, & communicate well. The ADD could have been under control with support, & proper education + short term medication. But, the depression before ~~that~~ being diagnosed was debilitating. And ~~to~~ when my doctor told me to start re-taking ~~the~~ ^{the} again, the depression got worse. Losing ~~the~~ my position re-initiated the depression, which I've dealt w/ for years. However, I am more stable now & can adequately ~~the~~ pursue a federal case.

If you need more info. I can provide the info.

However, ~~I~~ my depression was so severe that I began receiving ^{government} disability after losing my position with Wyeth.

The depression + anxiety ~~while~~ while working w/ Wyeth was debilitating + after termination it got much, much more severe. However, I would have been able to do my job well ~~off~~ after stopping the Effexor XR (getting meds right).

I just needed a reasonable accommodation.

Show how I adequately exhausted administrative remedies

- When Heller met w/ plaintiff @ Duncan Donuts, he asked if she was okay, saying he had noticed changes. She clearly told him she had been diagnosed with something bad, w/o receiving treatment. No discussion on what ^{was} the health issue at hand.
- He offered support in the form of temporary disability, she declined, telling him she would be fine.
- When she ~~was~~ found out she had been ^{first} misdiagnosed + ^{then} diagnosed properly by a specialist, she met w/ Heller, at his request, a few days later. She volunteered info about her new diagnosis, even telling him what it was + explaining she had just begun a new medication. He asked her to resign + began publicly embarrassing her. She opened up lines of communication + was honest w/ him about her diagnosis.
- She immediately spoke to her doc + he laid out what he, from experience, stated ~~was~~ a reasonable accommodation. Larson informed Heller of her request + she never heard from him again until he left her a voice mail, terminating her.
- Larson worked out of her home^{-in VA}, the nearest office was located in Pennsylvania. She texted HR offering to talk w/ them anytime. She called HR + they were very rude. All of this is detrimental to someone already dealing with depression + ADD + anxiety so severe it is difficult to even make a phone call ^{to} discuss personal issues + emailed.
- Larson repeatedly called Heller ~~repeatedly~~ ~~the~~ Heller, trying to open the lines of communication. He ignored her. He was her direct supervisor + he ignored her. She called him repeatedly b/c he was her direct supervisor. Also, she knew him, unlike the people in HR. So, she reached out to him repeatedly. She followed chain of command.

- After termination Larson filed a complaint w/ EEOC. EEOC offered her the choice of mediation or filing a federal law suit. She chose mediation. Wyeth declined. Larson hired an attorney but ultimately had to focus on her own health, along with losing her home & car. Even her phone was off ~~for~~ many times, making it difficult to discuss business w/ any stability & continuity.
- Larson stayed in touch w/ EEOC off & on for many years
- Larson began contacting Wyeth, ~~not~~ Pfizer, trying to resolve these matters without suing.

Claims intended to assert against defendant / FACTS

- ① - Failure to provide a reasonable accommodation as required under Am. W Disabilities Act, as requested ~~my~~ by ^{plaintiff} myself. of 1990, as amended.
- ② - creating a hostile ^{toxic} work environment by ostracizing, ignoring, bullying, yelling, public harassment, private harassment,
- ③ - stealing my mail off of my front porch, mail sent to me by ~~myself~~ ^{Myeth,}
- ④ - coming to my private home uninvited, unannounced, very early in the morning, **ABUSE OF POWER** ^{large boxes - I saw this with my own eyes + it scared me}
- ⑤ - trying to break into my ^{company} car, **ABUSE OF POWER**, scare tactics overstepping boundaries
- ⑥ - Unequal treatment as compared to someone else who requested time to recover, "unequal treatment ~~was~~ plaintiff believes lies due to ~~company~~ ^{superior} ~~company~~ ^{superior} + supervisor's prejudice against psychiatric illnesses.
- ⑦^a - failure to provide promised bonus
- ⑦^b - failure to provide plaintiff with an opportunity to obtain other transportation after supervisor encouraged her to sell her own ^{private} transportation, telling her that she would always have a company car.
- ⑧ - **ABUSE OF POWER -** creating a toxic work environment by coming to my home ~~unannounced~~ since I worked out of my home, I felt very unsafe even being home, which effected my entire life; work life, private life + medical life, preventing me from being able to focus on getting well + understanding ADD.
- ⑨ - ~~Former~~ ^{Myeth} turned even my own psychiatrist against me, (also a ^{Myeth} employee) preventing me from receiving proper treatment + causing fear of + distrust of all doctors for many years.

at time of termination

- ⑥ - explained more - Mr. Heller had been so willing to support me, even ~~offer~~ offering me ~~short~~ his support if I decided to take short term disability. He already had another employee out on short term disability, he explained. He said he would be supportive. Once he found out my problem was psychiatric, immediately he asked me to resign. Not only did he ignore my request for a reasonable accommodation, he turned my doctor against me, ignored me entirely, bullied me publicly & at my own home, & fired me. ^{just Duncan points}

Like,
one
minute
later

- ⑧ explained more - Heller made rude comments in IHOP, yelling, telling ~~her~~ ^{me} he made a mistake in hiring ~~her~~ ^{me}, saying there were so many people so much better than ~~her~~ ^{me} that he would love to hire, if he only had an opening, telling her "stop playing like your so innocent." People were staring at Lawson, even asking ~~me~~ ^{me} if ~~she~~ ^{she} was okay when ~~she~~ ^{she} left the restaurant.

- ⑩ I was not given a reason why I was excluded, discharged and subjected to different terms & conditions than the other employees who went out on short term disability.
- ⑪ I believe I was discharged, excluded, & subjected to different terms & conditions, in violation with the Americans w/ Disabilities Act of 1990, as amended. ^{Americans w/ Disabilities}
- ⑫ I believe the Nyct ~~scrips~~ ^{scrips} in the waiting room at the psychiatrist's office told her supervisor she had seen me, who then told my boss. I believe that is why he asked me to meet him at IHOP, because he ~~thought~~ ^{thought} ~~he~~ ^{he} didn't like that I was seen in a psychiatrist's office. The psychiatrist even knew about this (see narrative).

own home. Papamak was very difficult for me. I
was ~~str~~ struggling to keep up but, I was trying. I
was however - see next page -

All of this would have been better w/ proper treatment.
I would have been able to effectively perform
my duties if I had been granted the
reasonable accommodation I had requested.

(2)

able to still sell the product. When I was able to get out of my house without crying, ~~it could~~ when I could get myself together enough to go in and see a doctor, I did well. The depression had become so severe that I did not want to speak to anyone. I tried but, I found it difficult to function. So I saw a psychiatrist. I had never seen a psychiatrist previously. I was wary of picking at a random psych. I remembered a doctor at one of Wyeth's meetings I once attended. I had only seen his name & not him, so I called & made an appointment w/ him. He immediately diagnosed me w/ ADD. B/c he knew so much about Effexor XR, as he was a ^{paid} speaker for Wyeth, promoting the drug, he instantly informed me that I needed to stop taking Eff XR. He said he would start me ~~at~~ on an ADD medication & titrate me off of the Eff XR w/in 2 weeks. I was w/in that 2 week time period that Mr. Heller & I met at F&OP for lunch, where I explained to him that I had been diagnosed w/ ADD & he then asked me to resign. He did not however, ask in a reasonable manner. He began belittling me, yelling at me, embarrassing me in front of the other patrons, who began staring at me. He pulled out a sheet of paper & ordered me to write a letter of ~~to~~ resignation immediately. I did not write that letter. His entire attitude had changed towards me, since our previous conversation, months earlier, at Dorean Donuts. He said I had already told him that I had been diagnosed with something, saying I had lost my opportunity to go out on

He told me
I would
be years
before I
would
ever
receive
any
punishment.

either temp. disability. ~~at some point~~ ~~at some point~~.
 I expressed that I had been misdiagnosed.
~~The psychiatrist, offered to talk to the comp~~
 When I left UTHP & returned home that evening,
 I then contacted my doc who, as I said, offered
 to talk to the company & to ~~figure out~~ ^{tailored out} a
 reasonable accommodation. I declined having him
 talk to the company b/c I wanted to
 improve my communication skills, as that is
 something that ~~as~~ I had learned is often
^{subpar} ~~subpar~~ in someone w/ ADD. It certainly had been
 so in my case. I wanted to take this
~~an~~ ~~my~~ opportunity to learn & improve, with
 someone, my supervisor, who I had hoped would
 be supportive. I should have received the
 doctor's help. I contacted my supervisor &
 informed him of the reasonable accommodation
 I was requesting. As I recall, ~~it was~~ ^{it was} a
~~period~~ ^{period} of ~~rotation~~ ^{rotation} time where I
 would request weekly meetings with my supervisor
 to discuss improvement or areas where I needed
 to improve. After 3 or 4 weeks, I would request
 bi-weekly meetings. After 3 or 4 weeks, monthly
 meetings. After ~~about~~ a few months, ~~my~~ ^{these} ~~these~~
 meetings would no longer be necessary. This
 would allow me time to continue working,
 while in my personal time learning about
 ADD & how it had effected me & how I
 could improve myself. I never again heard
 from Mr. Heller or any of my supervisors
 above him, until I received a voice mail,
 3 months later, informing me that I had been
 terminated. I received the voice mail on a Sunday

morning, April 01, 2001. I had repeatedly contacted Mr. Heller by phone, by email and by US mail. I never received any reply from him. I stopped receiving any information involving team meetings. I was still dealing w/ extreme depression & the isolation made it much worse. Upon termination I did receive a phone call * from someone saying that Mr. Heller needed to come get my company car. (The only time I had seen or heard from him was when he showed up to my home around 5:30 am one morning w/ another sales rep named Matt. One stood at my back door & one @ my front door & just banged & banged on my doors, simultaneously. They tried to break into my company car. I was alone. I lived alone. I was in my pajamas. I was humiliated & scared.) - I did not answer the door. I expressed # to the person who called about the car that I felt uncomfortable w/ Mr. Heller coming to my home to pick up my car. I asked if I could meet him somewhere public & I asked if they could provide a way home for me, as Mr. Heller himself had advised me previously to sell my own personal car. He said I was going to have a long career w/ Wyeth & would not be needing my own car. Therefore, I sold my own car & had no way home. My depression ^{ADD} had caused me to have estranged & broken relationships w/ my family & w/ my friends. However, the lady said they could not do that & that Mr. Heller had to come to my home. He did, w/ one other man, & they picked up the company vehicle.

lady who
called me
from Wyeth

Also, when I first met w/ the psychiatrist, he was

so nice to me. While I was in his waiting room on the 1st visit, another sales rep from Wyeth was waiting to see the doctor, not as a patient but, as a sales rep for Wyeth. Previously, I had never seen her.

She had on a Wyeth name tag, as did I, so I went over + introduced myself. I did not know I was supposed to be ashamed

I was seeing a psychiatrist. She explained that she was a new employee + I welcomed her

→ to the company. I went in to see the doctor + then - again saw her. Once I was in the office I explained to the doctor what had occurred. He said to me, that

→ this was not something I wanted my company to know about, that I was seeing a psychiatrist. He said that next time, he would show me where the VIP entrance was located + I should use that entrance.

It is my belief, that this other employee, informed her boss that she had seen

→ me + told him where she had seen me, + that her boss had contacted my boss + had informed him (Mr. Heller). Then, Mr. Heller requested an emergency meeting w/me at the ITHOP. ~~I believe that he was~~

I told Mr. Heller about the incident while we were @ ITHOP. He got very upset w/me.

That is when he began yelling. I then informed him that I had previously been misdiagnosed + had now been properly diagnosed. At that time I informed him that my doctor

I told him before - he even mentioned it to me.

had told me that it would be a great sales rep but it needed to get off the Effexor & get used to the ADD medication. Then Mr. Heller got very loud & ugly & ~~has~~ began bullying me.

During the ~~time~~ ^{time} period where Mr Heller & others ignored ~~me~~ me, I did not know if I should go to see the doctors I was suppose to call on or not. Would it see another rep who would embarrass me in front of the doctors & nurses I was selling products to ^{I had worked & w/ whom} build relationships?

I had night mares about Mr Heller shooting me, driving by my house & shooting. I had no familial support, I was too embarrassed to tell anyone what was happening. I did not know if I should continue seeing my psychiatrist, as he was friendly ^{with me} (& an employee) of Wyeth's. I saw him a few times but, eventually began to distrust & fear my own doctor. So, going on & off medication made things much worse for me.

Upon termination my benefits (medical) changed. Most every doctor I tried to see also had some affiliation w/ Wyeth. Therefore, I trusted no doctor. My depression worsened & eventually I was hospitalized to prevent me causing harm to myself. It was embarrassing & humiliating & the experienced from changed my life & impacted my relationships & self esteem to such a degree

Would they yell at me how Heller had yelled?

that to this day I have family members
+ friendships that ~~it~~ have yet to
be mended.

After termination, I did however file a claim w/ the EEOC. ~~They~~
~~personally~~ ~~they~~ I wanted to do mediation
w/ Wyeth. They declined. Therefore, I hired
an attorney. The attorney + I spoke often,
as he was 4 or 5 hrs. outside of Tidewater.
Ultimately, he had to drop me as a client on
the basis that my health was more important
than the case. I had been on + off meds,
not had a stable doctor for any continuous
amount of time, I was ~~in~~ struggling but,
justice was ~~paramount~~ so important to me.

Prior to the time limit ~~to~~ to file a Federal
case initially ran out, the EEOC called me.
A lady encouraged me to pursue my case.
I had lost my home and I found
it difficult to focus on a legal case when
I needed other things to survive. Every
where I turned the domino effect of
having lost my position w/ Wyeth was manifesting.

← Some time later, after that lady from the EEOC
called me, I ~~no~~ no longer had a home phone or
a cell phone but I went to a pay phone +
called the EEOC. I spoke to Mr. Brown, who was
then the head of the EEOC. He said he would
review my case + I was to call him back in
a few days. I did call him + he
expressed to me that my case should
have never been closed. I have never
stopped contacting Wyeth, nor Pfizer. I have

a year
or two
later

spoken with a Danielle Rosen several times,
asking her to meet w/me and asking for my
bonus. She has sent letters & left voice
mails says this is not possible. ~~than~~

Also, when I met Mr. Heller at the UHOP,
I thought he was requesting a meeting
to congratulate me on some of my work
accomplishments. Although my communication skills
had suffered, along w/ administrative responsibilities,
my sales were very good. ADD causes
a person to not be able to communicate, at times,
& often the person suffers from a lack
of attention to detail, such as administrative
duties & procedures. I had met with the lead
pharmacist for De Paul Hospital, Marylaw Hospital
& Mary Immaculate hospital. Wyeth had
a new product called Protonix IV + ~~Protonix~~^{Protonix} oral.
I was blessed to sign all three hospitals
up to use those products. It was a really really
big deal. This is why my last
bonus should have been very, very large.

It should be noted that my psychiatrist turned on me, in favor of his employer, Wyeth. He told me that I should begin taking Effexor XR again. He knew the side effects were very, very bad for someone w/ ADD but, I was vulnerable & I listened to him. I began taking the anti-

depressant mixed with the ADD medication he recommended. I prescribed. This ~~form~~ combination caused me much harm & prevented me from ~~proxi~~ pursuing this case sooner bc it caused my depression & symptoms to get much worse.

What I /Kristina M. Lanson/plaintiff, want from this suit:

The last year I worked for Wyeth I made between \$65K + \$70K, I would like that amount x 20yrs, which is \approx \$1.4 million. I desire \$600,000.00 in punitive damages. I am requesting \$2,000,000.00; \$2 million.

Relative Exhibits! included